



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

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7/19/00

JUL 19 2000

Joan and
Denny were cc'd
on 981 letters to
scrap processors in Cook Co.

REPLY TO THE ATTENTION OF:

DW-8J

MS. JOAN O'CONNOR
CLEAN HARBORS ENVIRONMENTAL SERVICES
11800 SOUTH STONEY ISLAND AVENUE
CHICAGO, IL 60617

US EPA RECORDS CENTER REGION 5



450202

Re: Cook County PCB and Mercury CleanSweep Partnership

Dear Scrap Handler:

You are invited to participate in a unique, limited time opportunity to dispose of mercury and PCB-containing materials at greatly reduced prices, about 50% off. As I have corresponded with Ms. Tracy Mattson of the Institute of Scrap Recycling Industries, Inc., recent studies suggest processed scrap is a significant source of mercury to electric arc furnaces, which then emit mercury to the air. Please consider participating in the Cook County PCB and Mercury CleanSweep Partnership. Your activities would include removing mercury switches from automobiles and white goods and accumulating them prior to shipment to Clean Harbors Environmental Services, the contracted waste management partner. In addition, Clean Harbors Environmental Services can receive regulated as well as unregulated PCB electrical equipment. Bulk oils contaminated with polychlorinated biphenyls (PCBs) may be shipped to Safety-Kleen, another partner, for recycling.

The Partnership is not a formal incorporated entity. It is a group of public and private, government and non government entities. The purpose of the Partnership is to prevent emissions of PCBs and mercury from Cook County to Lake Michigan. Scientific research, funded in part by grants from the United States Environmental Protection Agency (U.S. EPA), has identified the Chicago metropolitan area as a relatively highly concentrated source of PCBs and mercury deposited to Lake Michigan via the air pathway.

The Partnership offers about 50% reduced costs for appropriate disposal or recycling of qualified materials from small businesses. For the purpose of this project, small businesses are defined as doing \$10 million or less in sales annually and having less than 200 employees. Local government agencies such as school districts, municipalities, and park districts may also

participate. The partners identified electricians and used oil handlers (identified through the National Oil Recyclers Association's PCB Clean Sweep feasibility study) as the target participants. These entities were considered to be potential sources of PCBs and mercury that were unlikely to be effectively controlled through traditional regulatory approaches. In addition, U.S. EPA staff working on the Binational Toxics Strategy identified scrap processors as potential beneficiaries of this project due to the processing of scrap containing PCB- and mercury- containing devices, such as motor starting aids and switches.

Although the enclosed tri fold brochure identifies December 31, 1999 as the ending date for the project, the project time frame has been extended to October 31, 2000. If you have any questions about how this project works, please call Ms. Joan O'Connor of Clean Harbors Environmental Services at 800-678-4244 ext. 555 (the recorded greeting may name Mr. Mike Kasal, formerly with Clean Harbors). Inquiries concerning bulk oils may be directed to Mr. Dennis Zawadni of Safety-Kleen's East Chicago re-refinery at (219) 391-6127.

Project participants will not be targeted for enforcement actions as a result of participation. U.S. EPA's position on enforcement for this Partnership project is stated in the March 5, 1998, letter from Norman R Niedergang, Director of the Waste, Pesticides and Toxics Division, U.S. EPA Region 5, to Christopher Harris, Esquire (copy available upon request). If you have any questions about Federal regulatory requirements applicable to project participants, you may call me and I will direct you to the appropriate person if I cannot answer your question. In addition, you may call the Resource Conservation and Recovery Act (RCRA) Hotline at 1-800-424-9346 with questions about regulations. You may reach me by telephone at (312) 353-6134, by fax at (312) 353-4788, and by E-mail at brauer.sue@epa.gov. ☐

Sincerely,



Sue Rodenbeck Brauer
Region 5 RCRA Used Oil Expert

Enclosure

cc: Mr. Dennis Zawadni
Ms. Joan O'Connor



COOK COUNTY PCB AND MERCURY CLEANSWEEP PROGRAM

Now through December 31, 1999
To participate, call: 1-888-SWEEP22
www.erc.uic.edu/cleansweep

You'll be surprised where Mercury or PCBs will turn up!

Dear Environmental Manager:

Take a moment to **LOOK AROUND** your property. You'll see potential sources of mercury and PCBs that can-unless properly managed and disposed of-cost you hundreds of dollars in clean up costs, increase your chances for future regulatory action and expose your workers to dangerous situations. This adds up to increased risk for you or your property!

Not only is your property vulnerable to these toxins, but so is Lake Michigan. PCBs and mercury-whether in liquids, bulk oil or equipment-can eventually make their way into your lake and the surrounding environment. The United States has designated these toxins among the highest environmental threats to the Great Lakes ecosystem because they accumulate in fish and animals, resulting in serious health and environmental damage. Every year, fishing advisories are issued in the Great Lakes cautioning people to limit the number of fish they eat due to PCBs, mercury and other pollutants.

Now You Can Do Something About These Dangerous Sources of Pollution!

The Cook County CleanSweep Partners have joined together to provide you with a non-regulatory opportunity to identify and properly manage these dangerous materials at a **GREATLY REDUCED COST** (savings of 50% or more are possible). Won't you join us in making a "clean sweep" of your property? Take a moment to look inside this brochure. We've designed a simple way to **LOOK AROUND** your property for sources of mercury and PCBs, and then get your mercury and PCB sources properly disposed of through the CleanSweep Program. We look forward to working with you.

Sincerely,

Cook County CleanSweep Partners

COOK COUNTY CLEANSWEEP PARTNERSHIP CAN HELP

The Cook County PCB and Mercury CleanSweep Partnership is a non-regulatory program sponsored by public and private entities. The CleanSweep Partners have joined resources to help small businesses and local governments identify and properly manage PCB and mercury containing materials through a convenient and cost saving program.

WHO CAN PARTICIPATE?

Small Businesses in Cook County that typically are doing \$10-million or less in sales and have less than 200 employees.

Local Government Agencies such as municipalities and park districts in Cook County.

WHY SHOULD I PARTICIPATE?

If you don't remove PCB and mercury containing equipment or liquids now, you will certainly pay later. Here's what we mean...

By removing the contaminated materials now, you eliminate the potential for an accidental spillage or discharge (which is regulated) and the resultant liability threats from exposure to workers and the community.

The replacement of mercury and PCB containing equipment could serve as a significant upgrade to your current processes. For example, if you replace mercury containing thermostats and thermometers with solid state circuitry, you will generally gain greater energy efficiency and accuracy benefits that will pay for themselves.

Should you ever wish to sell your current facility, the presence of PCB and mercury contaminated equipment will be revealed in an environmental site assessment—now standard for property transactions.

HOW CAN CLEANSWEEP HELP?

Here's how the program can benefit your facility...

The CleanSweep Partners have arranged for **GREAT SAVINGS** for participants in the CleanSweep program! From now through December 1999, your company can save 50% or more on disposal charges for PCB and mercury contaminated materials. Remember...the more you have, the more you save!

Our program is convenient. You can drop off your materials at our designated sites or arrange for them to be picked up at your location. Call us at **1-888-SWEEP22** for details or visit our website at www.erc.uic.edu/cleansweep for details.

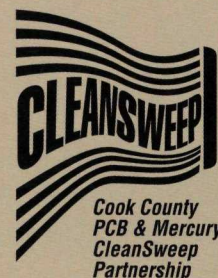
The CleanSweep Partners have worked together to make the CleanSweep regulatory friendly! Just follow the guidelines provided by our hotline.

GREAT! HOW DO I PARTICIPATE?

CleanSweep is an exclusive and limited opportunity for you to **LOOK AROUND** and clean up your facility of these dangerous pollutants.

Participating is as easy as 1-2-3.

- 1 Just **LOOK AROUND** your facility for materials listed in our brochure.
- 2 If you spot suspect materials, list them and their location in your facility.
- 3 Call the CleanSweep Hotline 1-888-SWEEP22 to answer your questions and arrange for disposal!



HOW TO SPOT MERCURY

Mercury is a nerve toxin that may impair the way we see, hear, walk and talk. When mercury finds its way into lakes or waterways, bacteria in the water convert it to methyl mercury, which contaminates the food chain by building up in fish tissue. When wildlife or humans eat the fish, they ingest the mercury, which builds up in their own tissue.

Minimizing mercury releases from ALL sources is important to our ecosystem and our health. It takes all of us to manage mercury wastes properly. Your CleanSweep Partners want you to be aware of the sources of mercury on your property, and then use the program to properly manage and dispose of this dangerous pollutant.

LOOK AROUND for Fluorescent and High Intensity Discharge Lamps.

Fluorescent lights are environmentally sound because they save energy. But they contain mercury, so they must be disposed of properly. The CleanSweep program has a system in place to properly manage and dispose of this source of mercury.

DO YOU HAVE GAS-FIRED EQUIPMENT WITH A PILOT LIGHT?

Chances are mercury is inside!

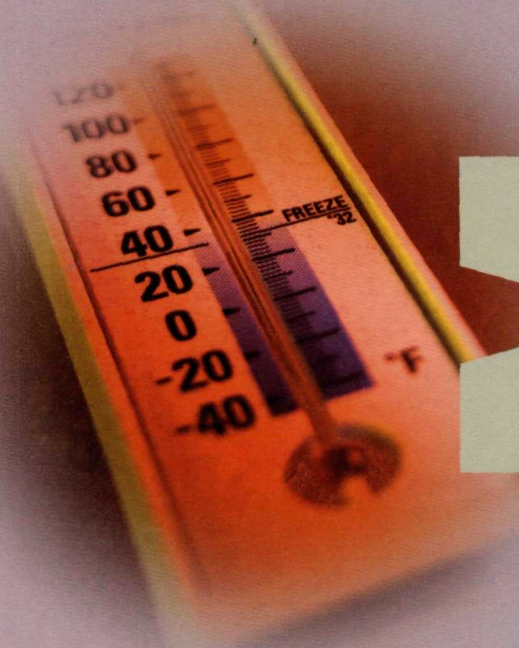
DO YOU SEE A THERMOSTAT WHEN YOU LOOK AROUND?

There's about 3 grams of mercury in this equipment! CleanSweep can help you dispose of it properly when it's time! Replacing mercury thermostats with programmable electric thermostats will reduce energy bills.

Vacuum gauges in machinery often contain mercury.

Fluorescent Lamps
Mercury Vapor Lamps
Metal Halide Lamps
High Pressure Sodium Lamps
Neon Lamps
Mercury Switches
Thermostat Probes
Relays
Thermostats
Arc Rectifiers
Float Control Switches in
Septic Tanks or Sump Pumps
Free or Elementary Mercury
Dental Amalgam (e.g., in Sink Traps)
Mercury Compounds
Mercury Salts
Laboratory Solutions
Thermometers
Manometers
Gauges (e.g., Barometers)
Sump Pumps
Float Switches
Mechanical Switches
Automobile Trunk/Hood Light Switches

**LOOK
AROUND**



HOW TO SPOT PCBs

PCBs (polychlorinated biphenyls) are a family of over 200 chemical compounds, ranging from light, oily fluids to heavy oils to greases and waxes. They are fire resistant, have excellent electrical insulation qualities and are chemically and thermally stable. Their major use was in electrical equipment and insulating liquid for capacitors and transformers.

PCBs decompose very slowly. They accumulate in the food chain and are insoluble in water. They accumulate in body fat. PCBs are a source of concern because PCBs are known or suspected to affect human health in a number of serious ways, including cancer, neurological and hormonal damage. Care must be taken in handling, disposing and managing equipment and liquids with these chemicals. CleanSweep offers you the perfect opportunity to deal with these pollutants.

LOOK AROUND For Transformers, Light Ballasts & Other Electrical Equipment

PCBs were used in electrical equipment manufactured in the 1930s and until 1978 as electric current-insulating material and coolant to prevent overheating and fires. Identifying all potential owners of equipment containing PCBs is difficult. LOOK AROUND your facility for the following, which may contain PCBs:

Transformers
Capacitors
Voltage Regulators
Circuit Breakers
Switches
Reclosers
Electromagnets
Small Capacitors

in Lamp Ballasts
in Starting Aids for Small Motors
in Refrigerators
in Washing Machines

Lamp Ballast Potting Material
Sealants and Oil Reservoirs

in Vapor Diffusion Pumps
in Vacuum Pumps
in Water Well Pumps

**LOOK
AROUND**

ARE PCBs FOUND IN NON-ELECTRICAL EQUIPMENT?

YES, PCBs may be used indefinitely in carbonless copy paper, in scientific instruments, in microscopy immersion oil, and in optical liquids for its physical and optical properties. Many other non-electrical sources of PCBs are subject to use and servicing restrictions. However, PCBs still may be found in them. So, LOOK AROUND for the following:

Hydraulic Systems

for Metal Forming
for Metal Die Casting
for Injection Molding
for Heat Treating
for Elevators

Mining Equipment
Heat Transfer Fluids
Pigments
Bulk Oils

for Road Oiling
for Fuel
for Cutting

**LOOK
AROUND**

DO YOU HAVE A LONELY DRUM?

Many facilities have accumulated liquids in drums for many years. These "lonely drums" are typically in non-traffic places in the facility. The CleanSweep Program offers you opportunities to not only find out what is in those drums, but dispose of them properly.



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YES!

I'm interested in saving money
under the CleanSweep Partnership.
Please have someone call me
about the following:

- ☐ Locating Mercury
within my facility
- ☐ Arranging for pickup or
dropoff from my facility
- ☐ Locating PCBs
within my facility
- ☐ Arranging for
pickup or dropoff
from my facility

Name _____

Title _____

Company _____

Address _____

City _____ State _____ Zip _____

Phone (_____) _____

Fax (_____) _____



COOK COUNTY PCB AND MERCURY CLEANSWEEP PROGRAM

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To participate, call: 1-888-SWEEP22
www.erc.uic.edu/cleansweep

PARTNERING TO HELP BUSINESS AND THE ENVIRONMENT

The Cook County CleanSweep Partners have been working together to build a clean up program that will encourage small business and local governments to **LOOK AROUND** and properly manage PCB and mercury contaminated materials. The CleanSweep Partners combine experts and the resources of local private industry and government agencies into one program that offers convenience, tremendous cost savings and the opportunity to lower risks to workers, your facility and our Cook County environment.

Through literature and training, our goal is to educate small businesses and local governments on how to identify equipment containing PCBs and mercury and to get them to rid their facilities of these dangerous toxins through our program.

The CleanSweep Partners encourage you to take this opportunity to **LOOK AROUND** and take advantage of our program. It not only helps your facility and business, but also benefits the entire Cook County community and ecosystem.

Won't you join us?

Currently, the Cook County CleanSweep Partners are:

City of Chicago Department of Environment

Clean Harbors Environmental Services, Inc.

Commonwealth Edison

Cook County Department of Environmental Control

Electric Association

Metropolitan Water Reclamation District of Greater Chicago

Illinois Environmental Protection Agency

National Oil Recyclers Association

North Business & Industrial Council

Safety-Kleen Corp.*

University of Illinois at Chicago School of Public Health

University of Illinois at Chicago Energy Resources Center

US Environmental Protection Agency Region 5

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*This project is supported by funds from the US EPA Region 5 Coastal Environmental Management Funds, Assistance Agreement *X985465-01-1

This project was undertaken in connection with the settlement of an enforcement action taken by the US EPA for alleged violations of the Toxic Substance Control Act.



*Cook County
PCB & Mercury
CleanSweep
Partnership*

c/o Accountability Information Management

553 N. North Court, Suite #110
Palatine, IL 60067-9910

**BULK RATE
U.S. POSTAGE
PAID
WHEELING, IL
PERMIT NO. 38**

**LOOK
AROUND**

**Cook County CleanSweep
Partnership is Looking
to Help You!**

Details Inside!

Cook County PCB and Mercury CleanSweep Partnership

Project Profile and Information Sheet

Project Name: Cook County PCB and Mercury CleanSweep Partnership ("Partnership")

Phase 1 Project Period: May 1, 1999 – December 31, 1999

Phase 2 Project Period: January 1, 2000 – October 31, 2000

Project Follow Up Period: November 1, 2000 – December 31, 2000

Sponsored by: Cook County CleanSweep Partnership

List of Cook County CleanSweep Partners:

- City of Chicago Dept. of Environment
- Cook County Department of Environmental Control
- Metropolitan Water Reclamation District of Greater Chicago
- Commonwealth Edison
- Safety-Kleen Corp.
- Clean Harbors Environmental Services, Inc.
- Electrical Association
- University of Illinois at Chicago School of Public Health
- North Business Industrial Council (NORBIC)
- National Oil Recyclers Association
- US Environmental Protection Agency Region 5
- Illinois Environmental Protection Agency

Mission of the Partnership:

To encourage small businesses and local government agencies in Cook County, Illinois:
to manage and safely dispose of mercury and PCB bearing equipment and PCB contaminated used oil in an environmentally safe manner

by providing a program with a significant financial incentive for disposal, convenient collection, material identification assistance and educational materials.

Eligible Entities for Partnership Project

Small Businesses in Cook County

Small businesses are defined as independently owned and operated companies residing in Cook County, Illinois that generate less than 1000 kilograms of hazardous waste in a calendar month (small quantity participants or conditionally exempt small quantity participants) with 200 or fewer employees and annual gross revenues under \$10 million.

Local Government Agencies in Cook County

Specific Goals of the Partnership:

- 1) To combine industry and government resources and knowledge to reduce the amount of PCB and mercury loaded into Lake Michigan;
- 2) To educate small businesses, local government and local non-profit organizations to identify mercury and PCB containing equipment;
- 3) To inform small businesses, local government and local non-profit organizations of the Cook County PCB and Mercury CleanSweep Partnership through a coordinated marketing effort.
- 4) To collect mercury and PCBs contaminated materials from small businesses, local government and local non-profit organizations.
- 5) Using measurable reporting and evaluation, assess the strengths and weaknesses of the Cook County PCB and Mercury CleanSweep Partnership as a pilot or demonstration project for other jurisdictions.

Partnership Incentives:

Financial Incentives

- For PCB and mercury containing materials **dropped-off at Clean Harbors**, participants will have the **drop-off fee waived and will receive a 50 percent reduction on their disposal costs.**
- For PCB and mercury contaminated materials and drum containers of PCB-contaminated used oil **picked-up by Clean Harbors**, participants will have **the pick-up fee waived and will receive a 50 percent reduction on their disposal costs.** The \$295 transportation fee will be the responsibility of the participant.
- For **Collection Events**, pre-qualified participants will receive a 50 percent reduction on their disposal costs.
- For drummed or bulk PCB-contaminated used oils, participants will receive **free testing and PCB destruction.** Participants will be responsible for transportation and applicable charges incurred for

collecting and transporting this waste. This service will be provided by Safety-Kleen Corp. through their Supplemental Environmental Project.

(For qualified wastes brought to Clean Harbors, Illinois EPA will pay the drop and pick up fee ranging between \$50 and \$200 dollars for participants in addition to 50% of the disposal cost)

Risk Management Incentives

- Reduce risk of mercury and PCB exposure to workers.
- Meet environmentally safe job site requirements set forth in insurance policies and customer contracts.
- Participants will be improving the environment where they work and helping to reduce bioaccumulative toxins going into Lake Michigan.
- Participants will gain basic knowledge of PCB and Mercury containing materials and equipment for future disposal decisions.
- Participants will gain basic knowledge of environmentally responsible storage, transportation and disposal of PCBs and mercury.

Regulatory Incentives:

- No increased risk of Federal enforcement actions (See EPA letter to NORA General Counsel Christopher Harris dated March 5, 1998).
- Participants can choose to have their company/organization information held confidential.
- Participants will gain basic knowledge of existing Illinois environmental regulations requiring them to properly dispose of and/or recycle PCB and mercury contaminated materials.

Participation:

Participants will use the following information to participate in the project:

For general information on the Cook County PCB and Mercury CleanSweep Partnership or what businesses or materials qualify for the project, contact the Cook County PCB and Mercury CleanSweep Partnership Hotline at 1-888-SWEEP-22 or visit our website at www.erc.uic.edu/cleansweep.

For price estimates or to arrange for pick-up or drop-off of mercury or PCB containing equipment or drums of PCB-contaminated liquids, contact Clean Harbors at 773-646-5111. Pick-ups and drop-offs must be pre-arranged and pre-qualified by Clean Harbors.

For price estimates or to arrange for the pick-up or drop-off of bulk PCB-contaminated used oil, contact Safety-Kleen Corp. at 1-219-391-6127; ask for Denny Zawodini. Pick-ups and drop-offs must be pre-arranged and pre-qualified by Safety-Kleen Corp.

Participants must identify the Cook County PCB and Mercury CleanSweep Partnership to Clean Harbors and/or Safety Kleen Corp to receive discounts.

The Partnership will announce collection events as they are scheduled.

Clean Harbors and Safety-Kleen Corp. have the responsibility for qualifying the participant and materials to ensure they meet the criteria for participation in the project.

Qualified Materials

Clean Harbors is contracted through Illinois EPA to accept Mercury and PCB containing equipment and drums of PCB-contaminated liquids. Fluorescent light bulbs will be added to the first phase of the program.

Safety-Kleen Corp. East Chicago facility is permitted to accept any level PCB-contaminated used oil as long as it is fit for re-refining.

List of qualifying materials accepted by Clean Harbors Environmental Services, Inc.:

- PCB containing ballasts, capacitors, switches, transformers (case by case if they are large, i.e. would not fit into a 55 gallon drum)
- Oils/Paints containing PCB's.
- Any other PCB containing article other than that meeting the definition of Radioactive and Potentially Infectious Medical Waste (PIMW).
- Mercury containing items such as paints, switches, thermometers, manometers, debris.
- Any other Mercury containing article other than that meeting the definition of Radioactive or Potentially Infectious Medical Waste (PIMW).
- Must fit in the following containers/UOM's (units of measure):
 - 55 gallon drums
 - 30 gallon drums
 - 16 gallon drums
 - 5 gallon pails
- Batteries
- Mercury containing fluorescent bulbs
- Anything that would not fit into a 55 gallon drum would be handled on a case by case basis with advice of the IEPA.